



701 Ninth Street, N.W.
Washington, DC 20068

December 17, 2013

Via Federal Express

Permit Contact (3 EN 23)
Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103 - 2029

RECEIVED
EPA REGION III
DEC 18 2013
NPDES PERMITS BRANCH (3WVP41)
RECEIVED
EPA REGION III
DEC 18 2013
NPDES PERMITS BRANCH (3WVP41)

Re: **Benning Service Center - NPDES Permit Application for Renewal of Permit
No. DC0000094**

Dear Sir/Madam:

Potomac Electric Power Company (Pepco) is pleased to submit an application for renewal of the Benning Service Center NPDES Permit. The application consists of EPA Forms 1, 2C and 2F, and various supporting attachments.

Please note that the facility named on the existing permit is the "Benning Generating Station." This generating station was one of several operations at the Benning Service Center site covered by this permit. As previously report to EPA, the power plant ceased operation in June 2012, but the site continues to function as a service center for Pepco's electric transmission and distribution system (including fleet services maintenance, transformer maintenance, and temporary storage of PCB materials and hazardous wastes) and houses three electric substations. For this reason, the renewal application uses "Benning Service Center" as the facility name.

As indicated in the application forms and attachments, the shutdown of the power plant has eliminated several of the process water discharges covered by the existing permit. The only remaining process water discharge is the effluent from the oil/water separator that is used to treat water removed from utility vaults within the District of Columbia and transported to the Benning Service Center (identified as monitoring point 003 in the current permit). All of the remaining discharges at the site consist of storm water.

Please also note that the power plant buildings and associated infrastructure (e.g., cooling towers) are currently being dismantled and removed from the site. The dismantling and removal of all of the power plant facilities is currently scheduled for completion by September 2014. As a result of the demolition activities, we currently do not have access to all of the necessary sampling points, and we have therefore been unable to collect and analyze samples of the facility discharges as necessary to provide all of the data that will be required to process the permit renewal application. As described further below, we expect to be able to collect the necessary samples within the next 90 days, and will

supplement this application with the additional data once that testing has been completed. In the meantime, we are submitting the application, in accordance with the deadline specified in the existing permit, using the existing and available information.

Please note the following additional information in response to certain items on the application forms:

1. Form 2C

Part II.A. - An existing flow line diagram is provided at Attachment 4. This flow line diagram was previously submitted to EPA on May 16, 2005 for the renewal of the Benning NPDES permit. As noted above, since the power plant shut down in June 2012, sources of intake water and various operations contributing process water to the effluent discharges from the facility have been eliminated. An updated flow line diagram will be provided to EPA upon completion of power plant demolition.

Part V. - All discharges (including storm and non-storm water discharges) from the facility to the Anacostia River are via Outfalls 013 and 101. Outfall 013 has been inaccessible (covered with mesh filter fabric which is secured with clean rock) since the demolition of cooling towers commenced in November 2013. Upon completion of cooling towers demolition, stormwater samples will be collected from this outfall and Outfall 101 during a qualifying storm event. Tables V.A, V.B, and V.C will be provided to EPA upon completion of testing.

2. Form 2F

Part III. - An existing Drainage Area Map is provided at Attachment 7. This map was previously submitted to EPA on May 16, 2005 for renewal of the Benning NPDES application. An updated map will be provided to EPA upon completion of the power plant demolition.

Part VII. - As explained above with respect to item V of Form 2C, Tables VII.A, VII.B, VII.C, and VII.D will be provided to EPA upon completion of discharge testing.

Please contact Fariba Mahvi at (202) 331-6641 or fmahvi@pepco.com, if you have any questions or need additional information regarding this submittal.

Sincerely,



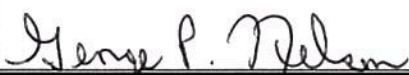
George P Nelson,
Vice President, Operations and Engineering
PHI Service Company

cc: Ms. Mary Letzkus, Water Protection Division, USEPA Region III
Mr. Collin Burrell, Water Quality Division, DDOE

Attachments

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					
II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms .					
SPECIFIC QUESTIONS		Mark "X"		SPECIFIC QUESTIONS	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		YES	NO	FORM ATTACHED	
			X		
		16	17	18	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		X	
		22	23	24	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			X		
		28	29	30	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		
		34	35	36	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		
		40	41	42	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			X		
		19	20	21	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			X		
		25	26	27	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			X		
		31	32	33	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X		
		37	38	39	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		
		43	44	45	
III. NAME OF FACILITY					
C. SKIP Benning Service Center					
15 16 - 29 30 69					
IV. FACILITY CONTACT					
A. NAME & TITLE (last, first, & title)					
C. Mahvi, Fariba, Lead Environmental Engineer					
15 16 45 46 48 49 51 52- 55					
B. PHONE (area code & no.)					
(202) 331-6641					
V. FACILITY MAILING ADDRESS					
A. STREET OR P.O. BOX					
C. 701 Ninth Street, NW Room 6220					
15 16 45					
B. CITY OR TOWN					
C. Washington					
15 16 40 41 42 47 51					
C. STATE					
DC					
D. ZIP CODE					
20068					
VI. FACILITY LOCATION					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
C. 3400 Benning Road, NE					
15 16 45					
B. COUNTY NAME					
46 70					
C. CITY OR TOWN					
C. Washington					
15 16 40 41 42 47 51 52 -54					
D. STATE					
DC					
E. ZIP CODE					
20019					
F. COUNTY CODE (if known)					

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VII. SIC CODES (4-digit, in order of priority)										
A. FIRST					B. SECOND					
C	7	4	9	1	1	C	7			
(specify) Electric Services					(specify)					
15	16	-	19		15	16	-	19		
C. THIRD					D. FOURTH					
C	7				C	7				
(specify)					(specify)					
15	16	-	19		15	16	-	19		
VIII. OPERATOR INFORMATION										
A. NAME								B. Is the name listed in Item VIII-A also the owner?		
C	8	Potomac Electric Power Company							<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
15	16								55 66	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box: if "Other," specify.)								D. PHONE (area code & no.)		
F = FEDERAL		M = PUBLIC (other than federal or state)		P		(specify)		A		
S = STATE		O = OTHER (specify)						(202) 872-2000		
P = PRIVATE				56				15 16 - 18 19 - 21 22 - 26		
E. STREET OR P.O. BOX										
701 Ninth Street NW										
26 55										
F. CITY OR TOWN					G. STATE	H. ZIP CODE	IX. INDIAN LAND			
C	B	Washington			DC	20068	Is the facility located on Indian lands?			
15	16				40 41	42 47 - 51	52 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
X. EXISTING ENVIRONMENTAL PERMITS										
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)					
C	T	I			C	T	I			
9	N		DC0000094		9	P		NA		
15	16	17	18	30	15	16	17	18	30	
B. UIC (Underground Injection of Fluids)					E. OTHER (specify)					
C	T	I			C	T	I			
9	U		NA		9		(see Attachment 1)		(specify)	
15	16	17	18	30	15	16	17	18	30	
C. RCRA (Hazardous Wastes)					E. OTHER (specify)					
C	T	I			C	T	I			
9	R		(see Attachment 1)		9				(specify)	
15	16	17	18	30	15	16	17	18	30	
XI. MAP										
<p>Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.</p>										
XII. NATURE OF BUSINESS (provide a brief description)										
<p>The Benning Service Center Facility occupies 77 acres in the northeast of the District of Columbia. The Facility is comprised of a retired electric generating station and a major service center. The generating station was shut down in June 2012 and is currently undergoing demolition. The demolition is tentatively scheduled to be completed by September 2014. The service center supports Pepco's operation of its electric transmission and Distribution system and houses three electric substations (a 69 kV switchyard, a 230 kV switchyard and a newly constructed 115 kV switchyard), Fleet Services Maintenance, Transformer Maintenance Shop, and PCB and hazardous waste accumulation temporary storage areas.</p> <p>Note - This is not a Treatment, Storage and Disposal Facility (TSDF).</p> <p>See Attachment 2 - Site Location Map</p>										
XIII. CERTIFICATION (see instructions)										
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.										
A. NAME & OFFICIAL TITLE (type or print)					B. SIGNATURE			C. DATE SIGNED		
George P Nelson, VP, Operations and Engineering								12/17/2013		
COMMENTS FOR OFFICIAL USE ONLY										
C										
15	16								55	

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Please print or type in the unshaded areas only.

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C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal? <input checked="" type="checkbox"/> YES (complete the following table) <input type="checkbox"/> NO (go to Section III)								
1. OUTFALL NUMBER (list)	2. OPERATION(S) CONTRIBUTING FLOW (list)	3. FREQUENCY		4. FLOW				C. DURATION (in days)
		a. DAYS PER WEEK (specify average)	b. MONTHS PER YEAR (specify average)	a. FLOW RATE (in mgd)		B. TOTAL VOLUME (specify with units)		
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	
013	OWS just ahead of MP 003. See Attachment 5A for further details.	1 - 2 per month	12	0.005 mgd	0.006 mgd	5000 gallon	6000 gallon	2 hours

III. PRODUCTION			
A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?X <input checked="" type="checkbox"/> YES (complete Item III-B) <input type="checkbox"/> NO (go to Section IV)			
B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)? <input type="checkbox"/> YES (complete Item III-C) <input checked="" type="checkbox"/> NO (go to Section IV)			
C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.			
1. AVERAGE DAILY PRODUCTION			2. AFFECTED OUTFALLS (list outfall numbers)
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	

IV. IMPROVEMENTS					
A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operations of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions. <input type="checkbox"/> YES (complete the following table) <input checked="" type="checkbox"/> NO (go to Item IV-B)					
1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. <input type="checkbox"/> MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED					
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EPA I.D. NUMBER (copy from Item 1 of Form 1)

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V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding – Complete one set of tables for each outfall – Annotate the outfall number in the space provided.

NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
NA			

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance, which you currently use, or manufacture as an intermediate or final product or byproduct?

☐ YES (list all such pollutants below)☒ NO (go to Item VI-B)

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VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☒ YES (identify the test(s) and describe their purposes below)

☐ NO (go to Section VIII)

Acute Whole Effluent Toxicity (WET) Test - Effluent samples from Outfall 101 (manhole K) and Outfall 013 and an upstream Anacostia River water sample were collected for WET testing in September 2013. The species tested were water flea (*Daphnia pulex*) and fathead minnow (*Pimephales promelas*). The 48 hour screening tests were performed in accordance with the methods described in EPA document 821-R-02-012. The analytical results did not indicate that the samples were acutely toxic to the two test species. A report of the WET testing was submitted to EPA with the DMRs for September 2013.

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☐ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☒ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
(See cover letter for further details).			

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

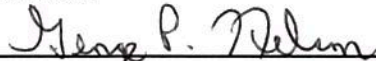
A. NAME & OFFICIAL TITLE (type or print)

George P Nelson, VP, Operations and Engineering

B. PHONE NO. (area code & no.)

(202) 872-2301

C. SIGNATURE



D. DATE SIGNED

12/17/2013

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages. SEE INSTRUCTIONS.

EPA I.D. NUMBER (copy from Item 1 of Form 1)
DC0000094

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)											OUTFALL NO.	
PART A –You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.												
Tables V-A, V-B, and V-C will be provided upon completion of testing. See cover letter for further explanation.	2.						3. UNITS (specify if blank)		4. INTAKE (optional)			
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (BOD)												
b. Chemical Oxygen Demand (COD)												
c. Total Organic Carbon (TOC)												
d. Total Suspended Solids (TSS)												
e. Ammonia (as N)												
f. Flow	VALUE		VALUE		VALUE					VALUE		
g. Temperature (winter)	VALUE		VALUE		VALUE			°C		VALUE		
h. Temperature (summer)	VALUE		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM	MAXIMUM	MINIMUM	MAXIMUM				STANDARD UNITS				

PART B – Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN-TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)														
b. Chlorine, Total Residual														
c. Color														
d. Fecal Coliform														
e. Fluoride (16984-48-8)														
f. Nitrate-Nitrite														

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK "X"		3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (as N)														
h. Oil and Grease														
i. Phosphorus (as P), Total (7723-14-0)														
j. Radioactivity														
(1) Alpha, Total														
(2) Beta, Total														
(3) Radium, Total														
(4) Radium 226, Total														
k. Sulfate (as SO ₄) (14808- 79-8)														
l. Sulfide (as S)														
m. Sulfite (as SO ₃) (14265- 45-3)														
n. Surfactants														
o. Aluminum, Total (7429-90-5)														
p. Barium, Total (7440-39-3)														
q. Boron, Total (7440-42-8)														
r. Cobalt, Total (7440-48-4)														
s. Iron, Total (7439-89-6)														
t. Magnesium, Total (7439-95-4)														
u. Molybdenum, Total (7439-98-7)														
v. Manganese, Total (7439-96-5)														
w. Tin, Total (7440-31-5)														
x. Titanium, Total (7440-32-6)														

EPA I.D. NUMBER (copy from Item 1 of Form 1)
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OUTFALL NUMBER

CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant if you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (*all 7 pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT								4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES		
				(1)		(1)		(1)					(1)				
				CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS				CONCENTRATION	(2) MASS			
METALS, CYANIDE, AND TOTAL PHENOLS																	
1M. Antimony, Total (7440-36-0)																	
2M. Arsenic, Total (7440-38-2)																	
3M. Beryllium, Total (7440-41-7)																	
4M. Cadmium, Total (7440-43-9)																	
5M. Chromium, Total (7440-47-3)																	
6M. Copper, Total (7440-50-8)																	
7M. Lead, Total (7439-92-1)																	
8M. Mercury, Total (7439-97-6)																	
9M. Nickel, Total (7440-02-0)																	
10M. Selenium, Total (7782-49-2)																	
11M. Silver, Total (7440-22-4)																	
12M. Thallium, Total (7440-28-0)																	
13M. Zinc, Total (7440-66-6)																	
14M. Cyanide, Total (57-12-5)																	
15M. Phenols, Total																	
DIOXIN																	
2,3,7,8-Tetra- chlorodibenzo-P- Dioxin (1764-01-6)				DESCRIBE RESULTS													

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT						4. UNITS			5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Accrolein (107-02-8)															
2V. Acrylonitrile (107-13-1)															
3V. Benzene (71-43-2)															
4V. Bis (Chloro- methyl) Ether (542-88-1)															
5V. Bromoform (75-25-2)															
6V. Carbon Tetrachloride (56-23-5)															
7V. Chlorobenzene (108-90-7)															
8V. Chlorodi- bromomethane (124-48-1)															
9V. Chloroethane (75-00-3)															
10V. 2-Chloro- ethylvinyl Ether (110-75-8)															
11V. Chloroform (67-66-3)															
12V. Dichloro- bromomethane (75-27-4)															
13V. Dichloro- difluoromethane (75-71-8)															
14V. 1,1-Dichloro- ethane (75-34-3)															
15V. 1,2-Dichloro- ethane (107-06-2)															
16V. 1,1-Dichloro- ethylene (75-35-4)															
17V. 1,2-Dichloro- propane (78-87-5)															
18V. 1,3-Dichloro- propylene (542-75-6)															
19V. Ethylbenzene (100-41-4)															
20V. Methyl Bromide (74-83-9)															
21V. Methyl Chloride (74-87-3)															

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (continued)															
22V. Methylene Chloride (75-09-2)															
23V. 1,1,2,2-Tetrachloroethane (79-34-5)															
24V. Tetrachloroethylene (127-18-4)															
25V. Toluene (108-88-3)															
26V. 1,2-Trans-Dichloroethylene (156-60-5)															
27V. 1,1,1-Trichloroethane (71-55-6)															
28V. 1,1,2-Trichloroethane (79-00-5)															
29V Trichloroethylene (79-01-6)															
30V. Trichlorofluoromethane (75-69-4)															
31V. Vinyl Chloride (75-01-4)															
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)															
2A. 2,4-Dichlorophenol (120-83-2)															
3A. 2,4-Dimethylphenol (105-67-9)															
4A. 4,6-Dinitro-O-Cresol (534-52-1)															
5A. 2,4-Dinitrophenol (51-28-5)															
6A. 2-Nitrophenol (88-75-5)															
7A. 4-Nitrophenol (100-02-7)															
8A. P-Chloro-M-Cresol (59-50-7)															
9A. Pentachlorophenol (87-86-5)															
10A. Phenol (108-95-2)															
11A. 2,4,6-Trichlorophenol (88-05-2)															

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)															
2B. Acenaphthylene (208-96-8)															
3B. Anthracene (120-12-7)															
4B. Benzidine (92-87-5)															
5B. Benzo (a) Anthracene (56-55-3)															
6B. Benzo (a) Pyrene (50-32-8)															
7B. 3,4-Benzo-fluoranthene (205-99-2)															
8B. Benzo (ghi) Perylene (191-24-2)															
9B. Benzo (k) Fluoranthene (207-08-9)															
10B. Bis (2-Chloro-ethoxy) Methane (111-91-1)															
11B. Bis (2-Chloro-ethyl) Ether (111-44-4)															
12B. Bis (2-Chloroisopropyl) Ether (102-80-1)															
13B. Bis (2-Ethyl-hexyl) Phthalate (117-81-7)															
14B. 4-Bromophenyl Phenyl Ether (101-55-3)															
15B. Butyl Benzyl Phthalate (85-68-7)															
16B. 2-Chloro-naphthalene (91-58-7)															
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)															
18B. Chrysene (218-01-9)															
19B. Dibenzo (a,h) Anthracene (53-70-3)															
20B. 1,2-Dichloro-benzene (95-50-1)															
21B. 1,3-Di-chloro-benzene (541-73-1)															

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT								4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED (if available)	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES	
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS		
																(1) CONCENTRATION
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (continued)																
22B. 1,4-Dichloro- benzene (106-46-7)																
23B. 3,3-Dichloro- benzidine (91-94-1)																
24B. Diethyl Phthalate (84-66-2)																
25B. Dimethyl Phthalate (131-11-3)																
26B. Di-N-Butyl Phthalate (84-74-2)																
27B. 2,4-Dinitro- toluene (121-14-2)																
28B. 2,6-Dinitro- toluene (606-20-2)																
29B. Di-N-Octyl Phthalate (117-84-0)																
30B. 1,2-Diphenyl- hydrazine (as Azo- benzene) (122-66-7)																
31B. Fluoranthene (206-44-0)																
32B. Fluorene (86-73-7)																
33B. Hexachloro- benzene (118-74-1)																
34B. Hexachloro- butadiene (87-68-3)																
35B. Hexachloro- cyclopentadiene (77-47-4)																
36B Hexachloro- ethane (67-72-1)																
37B. Indeno (1,2,3-cd) Pyrene (193-39-5)																
38B. Isophorone (78-59-1)																
39B. Naphthalene (91-20-3)																
40B. Nitrobenzene (98-95-3)																
41B. N-Nitro- sodimethylamine (62-75-9)																
42B. N-Nitrosodi- N-Propylamine (621-64-7)																

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE <i>(optional)</i>			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE <i>(if available)</i>		c. LONG TERM AVRG. VALUE <i>(if available)</i>		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS <i>(continued)</i>															
43B. N-Nitro- sodiphenylamine (86-30-6)															
44B. Phenanthrene (85-01-8)															
45B. Pyrene (129-00-0)															
46B. 1,2,4-Tri- chlorobenzene (120-82-1)															
GC/MS FRACTION – PESTICIDES															
1P. Aldrin (309-00-2)															
2P. α-BHC (319-84-6)															
3P. β-BHC (319-85-7)															
4P. γ-BHC (58-89-9)															
5P. δ-BHC (319-86-8)															
6P. Chlordane (57-74-9)															
7P. 4,4'-DDT (50-29-3)															
8P. 4,4'-DDE (72-55-9)															
9P. 4,4'-DDD (72-54-8)															
10P. Dieldrin (60-57-1)															
11P. α-Endosulfan (115-29-7)															
12P. β-Endosulfan (115-29-7)															
13P. Endosulfan Sulfate (1031-07-8)															
14P. Endrin (72-20-8)															
15P. Endrin Aldehyde (7421-93-4)															
16P. Heptachlor (76-44-8)															

EPA I.D. NUMBER (copy from Item 1 of Form 1)

OUTFALL NUMBER

DC0000094

CONTINUED FROM PAGE V-8

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT								4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCEN- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES		
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS			
GC/MS FRACTION – PESTICIDES (continued)																	
17P. Heptachlor Epoxide (1024-57-3)																	
18P. PCB-1242 (53469-21-9)																	
19P. PCB-1254 (11097-69-1)																	
20P. PCB-1221 (11104-28-2)																	
21P. PCB-1232 (11141-16-5)																	
22P. PCB-1248 (12672-29-6)																	
23P. PCB-1260 (11096-82-5)																	
24P. PCB-1016 (12674-11-2)																	
25P. Toxaphene (8001-35-2)																	



U.S. Environmental Protection Agency
Washington, DC 20460

FORM
2F
NPDES

Application for Permit to Discharge Storm Water Discharges Associated with Industrial Activity

Public reporting burden for this application is estimated to average 28.6 hours per application, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate, any other aspect of this collection of information, or suggestions for improving this form, including suggestions which may increase or reduce this burden to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, DC 20460, or Director, Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

[illegible]

A. Are you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

[illegible]

B: You may attach additional sheets describing any additional water pollution (or other environmental) projects which may affect your discharges) you now have under way or which you plan. Indicate whether each program is now under way or planned, and indicate your actual or planned schedules for construction.

Attach a site map showing topography (or indicating the outline of drainage areas served by the outfalls(s) covered in the application if a topographic map is unavailable) depicting the facility including: each of its intake and discharge structures; the drainage area of each storm water outfall; paved areas and buildings within the drainage area of each storm water outfall, each known past or present areas used for outdoor storage of disposal of significant materials, each existing structural control measure to reduce pollutants; storm water runoff, materials loading and access areas, areas where pesticides, herbicides, soil conditioners and fertilizers are applied; each of its hazardous waste treatment, storage or disposal units (including each area not required to have a RCRA permit which is used for accumulating hazardous waste under 40 CFR 262.34); each well where fluids from the facility are injected underground; springs, and other surface water bodies which received storm water discharges from the facility. (See Attachment 7- Drainage Area Map)

IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of impervious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
	(See Attachment 8)				

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed to minimize contact by these materials with storm water runoff; materials loading and access areas, and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.

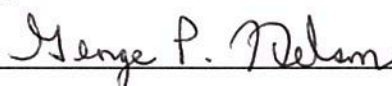
(See Attachment 9)

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
	(See Attachment 10)	

V. Nonstormwater Discharges

A. I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharged from these outfall(s) are identified in either an accompanying Form 2C or Form 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
George P Nelson, VP, Operations and Engineering		12/17/2013

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

Stormwater outfalls are identified in Attachments 3 and 6. The only outfall that receives non-storm water discharges is Outfall 013. All storm and non-storm water discharges to this outfall were identified in April 2005 for the renewal of the Benning NPDES Permit (see Attachment 5 for operations contributing flow to Outfall 013). Revised flow data for this outfall will be submitted to EPA once the power plant demolition is completed.

VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

(See Attachment 11)

DC0000094

VII. Discharge Information

A, B, C, & D: See instructions before proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space provided.

Table VII-A, VII-B, VII-C are included on separate sheets numbers VII-1 and VII-2. **(Tables VII.A, VII.B, VII.C, & VII.D will be provided upon completion of testing. See cover letter for further explanation).**

E. Potential discharges not covered by analysis – is any toxic pollutant listed in table 2F-2, 2F-3, or 2F-4, a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ Yes (list all such pollutants below)☒ No (go to Section IX)**VIII. Biological Toxicity Testing Data**

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☒ Yes (list all such pollutants below)☐ No (go to Section IX)

Acute Whole Effluent Toxicity (WET) Test - Effluent samples from Outfall 101 (manhole K) and Outfall 013 and an upstream Anacostia River water sample were collected for WET testing in September 2013. The species tested were water flea (*Daphnia pulex*) and fathead minnow (*Pimephales promelas*). The 48 hour screening tests were performed in accordance with the methods described in EPA document 821-R-02-012. The analytical results did not indicate that the samples were acutely toxic to the two test species. A report of the WET testing was submitted to EPA with the DMRs for September 2013.

IX. Contract Analysis Information

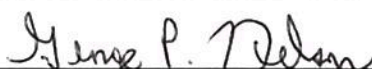
Were any of the analyses reported in Item VII performed by a contract laboratory or consulting firm?

☐ Yes (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)☒ No (go to Section X)

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed
(See cover letter for further details)			

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name & Official Title (Type Or Print)
George P Nelson, VP, Operations and EngineeringB. Area Code and Phone No.
(202) 872-2301C. Signature D. Date Signed **12/17/2013**

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease		N/A				
Biological Oxygen Demand (BOD5)						
Chemical Oxygen Demand (COD)						
Total Suspended Solids (TSS)						
Total Nitrogen						
Total Phosphorus						
pH	Minimum	Maximum	Minimum	Maximum		

[illegible]

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

[illegible]

Part D – Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)

7. Provide a description of the method of flow measurement or estimate.

EPA ID Number - DC0000094

Attachment 1 - Response to Question X. of Form 1

C. RCRA Permit

Benning Service Center - DC000819516

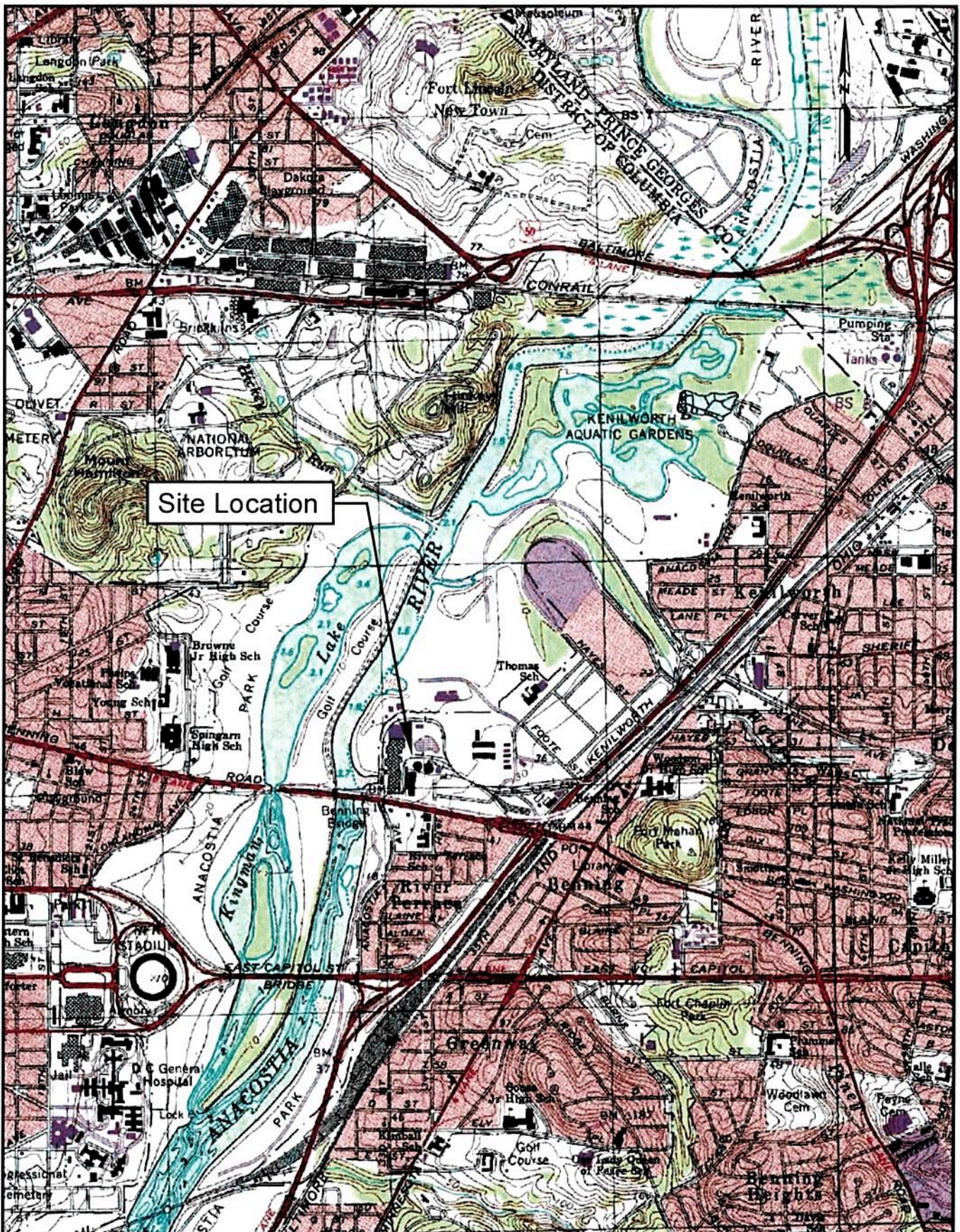
E. Other Environmental Permits

Air Permit# 026-R1

Oil Operations Permit - 2009-OPV-3141A

Temporary Discharge Authorization Permit - 0312-882

Waste Hauler Permit - WH41



AECOM

Source:
USGS 7.5 Minute Topographic Map
Washington East Quadrangle

0 1000 2000 4000
SCALE IN FEET

Benning Road Facility
3400 Benning Rd., NE
Washington, DC 20019

Attachment 2 Site Location Map

DATE: 07/09/2012

DRAWN BY: LAD

CHECKED BY: RD

Attachment 3 - Response to Question 1 of Form 2C

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG	2. MIN	3. SEC	1. DEG	2. MIN	3. SEC	
005	38	53	54	76	57	5	Washington, DC Storm Sewer System
006	38	53	45	76	57	26	Washington, DC Storm Sewer System
013	38	53	60	76	57	30	Anacostia River
014	38	54	1	76	57	15	Washington, DC Storm Sewer System
015	38	53	60	76	57	13	Washington, DC Storm Sewer System
101	38	53	46	76	57	36	Anacostia River
401	38	53	56	76	57	8	Washington, DC Storm Sewer System

EPA ID # DC0000094

Attachment 4 – Response to Question II.A of Form 2C

Attachment 5 - Response to Question II.B of Form 2C

1. Outfall Number	2. Operations Contributing Flow		3. Treatment Units	
	a. Operation ⁽¹⁾	b. Average Flow(mgd) ⁽²⁾	a. Description	b. List Codes
005	Runoff from parking area (area 25)	0.07	Discharge to surface water	4-A
006	Runoff from parking areas and Benning Road entrance road (area 9)	0.28	Discharge to surface water	4-A
014	Runoff from northeast side of property including roadways and storage areas (area 23)	0.28	Discharge to surface water	4-A
015	Runoff from Substation 7 and roadways all collect in water quality structure prior to discharge(area 27)	0.43	Settling in WQS	1-U
			Discharge to surface water	4-A
013	Stormwater and process water flow (see a thru s below) is discharged to Anacostia River via the 54 inch storm drain pipe:	5.86	Discharge to surface water	4-A
	a. Internal discharge point 420 - runoff from yard drains and roadways (area 11) plus flow from three discharges points 201, 204 and 703:	2.107		
	1. Internal MP 201- effluent from Plant's oil/water separator which consist of stormwater runoff from areas 3 and 6 and yard drains		Settling in oil/water separator	1-U
	2. Internal discharge point 204 - stormwater overflow from lift station when influent exceeds 500 gpm			
	3. Internal discharge point 703 - runoff from area 7 to water quality structure		Settling in water quality structure	1-U
	b. Internal discharge point 206 - runoff from gravel area (area 8) (see Note 1)			

	c. Internal discharge point 402- runoff from parking areas, building 57, south sides of buildings 54 and 56 (area 17).	0.435		
	d. Internal discharge point 403 - runoff from roadway (area 22) to water quality structure	0.253	Settling in water quality structure	1-U
	e. Internal discharge point 404 - runoff from parking areas and roadway on the southeast corner of property (areas 18 and 21)	0.297		
	f. Internal discharge point 405 - runoff from parking areas on the north sides of Buildings 54 and 56 (area 24)	0.313		
	g. Internal discharge point 406- effluent from T&D oil water separator (MP 003), runoff from parking areas, Building 59, south side of Building 75 and internal roadways (area 14)	0.737	Carbon filtration prior to discharge to MP 003	2-A
	h. Internal discharge point 407 - runoff from parking areas and roadway east of storage building 42 (area 28)	0.183		
	i. Internal discharge point 408- runoff from storage yard, Buildings 60, 41 and 61, north side of Building 42, southeast side of Building 88, and northeast side of Building 75 and internal roadways (area 15)	0.341		
	j. Internal discharge point 409 - runoff from loading area on the north side of Building 88 (area 16)	0.292		
	k. Internal discharge point 413 - runoff from yard areas, internal roadways and east side of Fire Pump House (area 29)	0.053		
	l. Internal discharge point 414 - runoff from Substation 41 and transformer spill containment pits (area 13)	0.005		
	m. Internal discharge point 415- runoff from yard area (area 30)	0.083		
	n. Internal discharge point 416 - runoff from parking	0.273		

	areas, material stockyard, Building 44 and internal roads (area 12)			
	o. Internal discharge point 417 - runoff from salvage yard and internal roadways (areas 10 and 33)	0.028		
	p. Internal discharge point 418 - runoff from parking area (area 19)	0.112		
	q. Internal discharge point 419 - runoff from internal roads west of building 88 (area 31)	0.066		
	r. Internal discharge point 425 - Runoff from internal road between north side of Building 75 and south side of Building 88 (area 32)	0.108		
	s. Internal discharge 010 - No discharge from the Drying Pit since the drain pipe is capped and locked.	None		
101	Runoff from southwest corner of the property including interior roadways, landscaping and generating station roof drains (area 2).	0.53	Discharge to surface water	4-A
401	Runoff from Substation 7 transformer and reactor spill containment pit; Substation 7 fire protection room, floor drain and city water valve leakage; cable vault floor drains and transformer containment area (area 26)	0.14	Discharge to Surface Water	4-A

Notes:

- (1) Discharge points 202 and 203 (cooling towers blow down) and discharge point 207 (cooling tower unit 15 overflow), and cooling tower unit 16 overflow to discharge point 206 were eliminated when the power plant was shut down in June 2012.
- (2) Data previously submitted to EPA on May 16, 2005 for the renewal of the Benning NPDES Permit. Revised flow data for each outfall will be submitted to EPA once the power plant demolition is completed.

Attachment 5A - Response to Question II.C of Form 2C

Water removed from utility manholes within the District of Columbia is transported to the Benning facility and is discharged into an OWS just ahead of MP 003, as described in Attachment 5 (Outfall 013, item g.) and Attachment 10 (item 4). This OWS operates in a batch mode approximately once or twice per month, 12 months per year. Each discharge lasts for approximately 2 hours with a total flow of approximately 5000 gallons.

Attachment 6 - Response to Question 1 of Form 2F

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG	2. MIN	3. SEC	1. DEG	2. MIN	3. SEC	
005	38	53	54	76	57	5	Washington, DC Storm Sewer System
006	38	53	45	76	57	26	Washington, DC Storm Sewer System
013	38	53	60	76	57	30	Anacostia River
014	38	54	1	76	57	15	Washington, DC Storm Sewer System
015	38	53	60	76	57	13	Washington, DC Storm Sewer System
101	38	53	46	76	57	36	Anacostia River
401	38	53	56	76	57	8	Washington, DC Storm Sewer System

EPA ID # DC0000094

Attachment 7 - Response to Question III of Form 2F

Attachment 8 - Response to Question IV. A of Form 2F

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
005	0.39 Acres	0.59 Acres
006	2.26 Acres	2.27 Acres
013	39.94 Acres	50.27 Acres
014	1.88 Acres	2.42 Acres
015	1.52 Acres	4.34 Acres
016	1.54 Acres	2.27 Acres
101	3.92 Acres	4.38 Acres
401	1.05 Acres	1.12 Acres

Note - The data presented above were previously submitted to EPA on May 16, 2005 for the renewal of the Benning NPDES Permit. Due to the generating station demolition, the impervious surface areas for outfalls 013 and 101 (Manhole K) will change. Once the demolition is completed, the areas of impervious surfaces and the total surface area drained to these outfalls will be recalculated, the existing data for all other outfalls identified above will be verified, and a revised data will be submitted to supplement this permit renewal application.

Attachment 9 - Response to Question IV-B of Form 2F

Oil Storage Area

- Used Oil - The used oil is stored in a 500 gallon used oil tank located outside Building 75. The tank has built-in secondary containment.
- Mineral Transformer Oil - The transformer oil is stored in four (4) aboveground tanks. The tanks are located under a canopy structure. The concrete diked area can hold 140% of the volume of one tank.

Chemical Storage Area

- There are no chemical storage areas in the facility. Chemicals (Ammonia and Sulfuric Acid) stored on the power plant area were removed and disposed off-site before the demolition work commenced.

PCB and Hazardous Waste Storage Area

- PCB Building - This building is used for temporary storage of PCB materials and hazardous waste prior to disposal off-site. The floor is concrete and has an epoxy coating that is impervious to any oil or chemical spills. There is a containment curbing around the interior perimeter. There are no floor drains within the building that connect to the facility's storm drain system. An internal drain pipe is connected to a 2,000 gallon fiberglass underground tank equipped with manhole access for pumping and off-site disposal.

Oil Filled Electrical Equipment Storage Area

- Outside of Building 56 - New and off-line electrical equipment is temporarily stored outside pending removal to the Transformer Test Shop. Oil absorbent booms are in place around this equipment. Off-line transformers with unknown PCB content are temporarily stored in a concrete berm area which is covered by a canopy.
- Outside storage areas - Stores Department areas in the vicinity of Buildings 44, 88, 40, 60, 41, 61, 42, 66 and the Stores salvage yard are used for storage of new and off-line transformers, capacitors and various electrical equipment. This equipment contains non- PCB oil.

Pesticide/Herbicide Use ⁽¹⁾

Pesticides

<u>Trade Name</u>	<u>Chemical Name</u>	<u>Application</u>	<u>Location</u>
Maxforce	Hydramethylnon	Kill Roaches	All Buildings Interior
Contrac	Bromadiolone	Kill Rats and Mice	Building Nos. 65 and 75

Herbicides

Roundup ⁽²⁾	Glyphosate	Kill Weeds & Poison Ivy	Around Buildings, Parking lots, Substations & Switchyards
Diuron 80	Dimethylurea	Kill Weeds & Poison Ivy	Substations & Switchyards
Riverdale Spyder		Kill Weeds & Poison Ivy	Substations & Switchyards
Riverdale Razor		Kill Weeds & Poison Ivy	Substations & Switchyards
SURF AC 820	Non-ionic Surfactant	Kill Weeds & Poison Ivy	Substations & Switchyards
Weedestroy AM-40	Dimethylamine Salt	Kill Weeds & Poison Ivy	Substations & Switchyards
Supersate	Glyphosate	Kill Weeds & Poison Ivy	Around Buildings & Parking lots

(1) - Pepco uses the services of outside contractors for pesticides and herbicides applications at Benning.

(2) - Substation has only a 55 gallon drum of Roundup inside the Gardner's Shop in Building 54.

Attachment 10 - Response to Question IV-C of Form 2F

STRUCTURAL CONTROLS (for Outfall 013)

1. Secondary Containment - Oil filled electrical equipment is provided with secondary containment (concrete dikes or berms) or surrounded by oil absorbent booms in order to prevent the discharge of any leak, spill, or overflow into the storm drains.

2. Water Quality Structures - Three water quality structures are located on the Facility and identified as WQ on the Benning Drainage Area Map. The locations of these structures are as follows.

<u>Location of Water Quality Structures</u>	<u>Discharge Point</u>
Adjacent to Substation 7 and Foote Street	015
On the parking lot, South of Substation 7	403
Adjacent to Monitoring Point (MP) 201	MP 201

The water quality structures are designed to remove debris and sediment from the process and storm water by gravity separation. The structures are inspected and cleaned of sediment build-up twice a year. (The WQ structure located at MP 201 is currently inaccessible due to the power plant demolition).

3. Underground Sedimentation Filtration Vault - This vault (also identified as WQ on the Benning Drainage Area Map) was installed in the employee parking lot (south of Storage Building 42) in March 2011 as part of the upgrades to the stormwater drainage system at the Gas Insulating Switchyard (GIS), which is located inside Substation 7. There are 18 cartridges inside the vault to filter and remove suspended solids and sediment from storm water originating from the GIS. The filtered water flows to the 54 inch storm drain pipe.

4. Oil/Water Separators - Two oil/water separators (OWS) are located at the Benning Service Center. One OWS is located ahead of MP 003 and is used to remove oil and grease and solids from water which is pumped from Pepco's utility manholes within the District of Columbia and transported to

the facility. The effluent from the OWS passes through carbon filters prior to MP 003 and eventually discharges through outfall 013. The second OWS is located ahead of MP 201 and is currently used to treat yard drainage and sump infiltration (in the power plant basement) which discharge to the lift station prior to being pumped to the oil/water separator. (Note - the sump infiltration will be eliminated once the power plant building is demolished).

NONSTRUCTURAL CONTROLS (for Outfalls 013 and 101)

1. Low Impact Development (LID) Projects - Three LID projects were constructed at the Benning Service Center, identified as 4a, 4b and LID project 3 on the Drainage Area Map. The purpose of these projects is to capture storm water runoff along the heavily trafficked main access road and the employee parking lot. These locations were identified to have the highest potential for capturing polluted runoff from vehicle traffic. The first LID, built in December 2002, is an infiltration swale and drains a parking lot area of approximately 0.3 acre. The second LID, built in October 2004, is a rain garden and drains a yard area of approximately 0.09 acre. The third LID built in 2007, is a linear bioretention system upgradient of the rain garden in the same drainage area. The Benning Stormwater Pollution Prevention Plan provides a maintenance schedule for the LID.

2. TMDL Implementation Plan - As part of the TMDL implementation Plan developed in accordance with the facility's NPDES permit requirements and approved by EPA in July 2010, additional control measures to reduce stormwater contamination have been implemented as follows:

- a. Phase I - Storm Drain Inlet Maintenance:
 - Metal absorbing inlet guards have been installed at all storm drain inlets throughout the facility, except for six inlets where the configuration or design of them did not permit the placement of inlet guards.
 - Heavy duty inlet guards have been placed at areas where there are heavy traffics.
 - Oil absorbing booms are in place around the majority of inlets, except in heavy traffic areas where it would be impractical to install them.
- b. Phase II - Metal Management:
 - Stored metal in areas exposed to the weather has been either removed from the site or covered up for protection from rainfall.

Monthly inspections and maintenance of storm drain inlets and metal management practices are being conducted throughout the site as part of the facility's SWP3 to minimize potential sources of metals in stormwater discharges from the facility. Additional inspections are also conducted after heavy storms to ensure that the control measures applied at the storm inlets remain intact.

Additional measures to protect the storm drain inlets during the generating station demolition have been implemented. This includes covering all the inlets affected by the demolition activities with mesh filters fabric and securing the fabrics with clean rocks. These measures were implemented in addition to the existing metal absorbing guards and sediment removing socks in place.

EPA ID NUMBER - DC0000094

Attachment 11 – Response to Question VI of Form 2F

Location	Date (m/d/y)	Spill	Leak	Type of Material	Quantity	Source, If known	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (T/F)	Preventive Measures Taken
Transformer Storage Yard	6/28/2013	X		Mineral Oil	50 gallons	Damaged transformer	Transformer struck by a forklift	All	T	Employee briefing
Generating Station	6/11/2013	X		No. 4 Fuel Oil	25 gallons	Abandoned Oil Tank	Contractor failed to plug abandoned fuel oil line before storm event.	Estimated 20 gallons	T	Contractor Training
Transformer Storage Yard	3/15/2013	X		Mineral Oil	5 gallons	Transformer	Unit being transported was struck by a vehicle	All	T	Employee briefing
Fuel Island	9/12/2012	X		Gasoline	1 gallon	Fuel Pump	Employee error - Overfilled portable tank	All	T	Employee briefing
Benning Roadway	8/9/2011	X		Diesel Fuel	10 gallons	Contractor truck	Leaking fuel line	All	T	Equipment repaired
Substation 7	4/5/2010	X		Mineral Oil	50 gallons	Transformer	Bushing failure	All	T	Equipment repaired
Substation 14	1/14/2010	X		Mineral Oil	10 gallons	Transformer B-0650	Bushing failure	All	T	Equipment repaired

Department of Consumer and Regulatory Affairs

Permit Operations Division

1100 4th Street SW

Washington DC 20024

Tel. (202) 442 - 4589 Fax (202) 442 - 4862



R

RAZE PERMIT

THIS PERMIT MUST ALWAYS BE CONSPICUOUSLY DISPLAYED AT THE ADDRESS OF WORK
UNTIL WORK IS COMPLETED AND APPROVED

PERMIT NO. R1300073

Date: 05/21/2013

Address of Project: 3400 BENNING RD NE				Zone:		Ward: 7		Square: PAR		Suffix:		Lot: 0114	
Description of Work: PEPCO ENERGY SERVICE- PUMP HOUSES AND TWO CLARIFER						Bldg Vacant: Yes		No. of Bldg(s): 7		Raze entire Bldg.: Yes			
Permission Is Hereby Granted To Potomac Electric Power Company		Owner Address: 701 9TH ST NW WASHINGTON, DC 20001-4501		Length: 304 FT	Width: 184 FT	Height: 116 FT	Vol of Bldg.: 6488676 CU.FT		PERMIT FEE: \$3,426.46				
Building Material: Other	Party Wall: No	Existing Use: Other (Specify)		Insurance Co			Insurance Policy No.:		Existing Units:				
Raze Contractor:				Address:				Tel No.:		Lic No.:			
<p>Conditions/ Restrictions:</p> <p>Inspections Administration to be notified 24-hours before raze operation. Tel: (202) 442-4641.</p> <p>CONDITIONS: As a condition precedent to the issuance of this permit, the owner agrees to conform with all conditions set forth herein, and to perform the work authorized hereby in accordance with the approved application and plans on file with the District Government and in accordance with all applicable laws and regulations of the District of Columbia. The District of Columbia has the right to enter upon the property and to inspect all work authorized by this permit and to require any change in construction which may be necessary to ensure compliance with the permit and with all the applicable regulations of the District of Columbia. Work authorized under the Permit must start within one(1) year of the date appearing on this permit or the permit is automatically void. If work is started, any application</p> <p>Disturbing Paint in Pre-1978 Residential Properties or in Child-Occupied Facilities</p> <p>If work related to this Permit will disturb more than 2 square feet of paint, the permit holder must abide by all applicable requirements in the District's "Lead Hazard Prevention and Elimination Act, as amended" (for more info, see www.ddoe.dc.gov, Lead and Healthy Housing Division), and must also abide by any applicable requirements of EPA's "Renovation, Repair and Painting Rule" (for more info, see www.epa.gov/lead, Renovation, Repair and Painting).</p>													
Director: Nicholas A. Majell <i>Nicholas Majell</i>				Permit Clerk Donya Jackson <i>Donya Jackson</i>				Expiration Date:					
<p>TO REPORT WASTE, FRAUD OR ABUSE BY ANY DC GOVERNMENT OFFICIAL, CALL THE DC INSPECTOR GENERAL AT 1-800-521-1638</p> <p>FOR CONSTRUCTION INSPECTION INQUIRIES CALL (202) 442-4480; TO SCHEDULE INSPECTIONS PLEASE CALL (202) 442 9557</p>													

Department of Consumer and Regulatory Affairs

Permit Operations Division

1100 4th Street SW

Washington DC 20024

Tel. (202) 442 - 4589 Fax (202) 442 - 4862



D

DEMOLITION PERMIT

THIS PERMIT MUST ALWAYS BE CONSPICUOUSLY DISPLAYED AT THE ADDRESS OF WORK
UNTIL WORK IS COMPLETED AND APPROVED

PERMIT NO. D1300361

Date: 03/26/2013

Address of Project: 3400 BENNING RD NE		Zone:	Ward: 7	Square: PAR	Suffix: 0169	Lot: 0114
Permission Is Hereby Granted To: Pepco Energy Services		Owner Address: 1300 N 17TH STREET, SUITE 1600 22209		PERMIT FEE: \$36.30		
Description of Work: Renewal of Demolition Permit #D1100362 which expired 7/01/2012 - Demolish cooling towers in Power Plant - Owners are de-commissioning the plant						
Type of Demolition: Exterior	Type of Walls: NA	# of Ext. Walls Removed: 0	Existing # of Stories: 0	Area of Disturbed Earth > 50sqft:		
Roof Remain: No	Existing Use: Utility		Proposed Use: Utility		Plans: Yes	
Agent Name: A2z Environmental Group	Agent Address:	Existing Dwell Units: 0	Proposed Dwell Units: 0	No. of Stories: 0	Floor(s) Involved:	
Conditions/ Restrictions: This Permit Expires If no Construction is Started Within 1 Year or If the Inspection is Over 1 Year. All Construction Done According To The Current Building Codes And Zoning Regulations; As a condition precedent to the issuance of this permit, the owner agrees to conform with all conditions set forth herein, and to perform the work authorized hereby in accordance with the approved application and plans on file with the District Government and in accordance with all applicable laws and regulations of the District of Columbia. The District of Columbia has the right to enter upon the property and to inspect all work authorized by this permit and to require any change in construction which may be necessary to ensure compliance with the permit and with all the applicable regulations of the District of Columbia. Work authorized under this Permit must start within one(1) year of the date appearing on this permit or the permit is automatically void. If work is started, any application for partial refund must be made within six months of the date appearing on this permit.						
Director: Nicholas A. Majett		Permit Clerk: Mark Briscoe		Expiration Date: 03/26/2014		
TO REPORT WASTE, FRAUD OR ABUSE BY ANY DC GOVERNMENT OFFICIAL, CALL THE DC INSPECTOR GENERAL AT 1-800-521-1639 FOR CONSTRUCTION INSPECTION INQUIRIES CALL (202) 442-9557 TO SCHEDULE INSPECTIONS PLEASE CALL (202) 442-9557.						

Department of Consumer and Regulatory Affairs

Permit Operations Division

1100 4th Street SW

Washington DC 20024

Tel. (202) 442 - 4589

Fax (202) 442 - 4862



D

DEMOLITION PERMIT

THIS PERMIT MUST ALWAYS BE CONSPICUOUSLY DISPLAYED AT THE ADDRESS OF WORK
UNTIL WORK IS COMPLETED AND APPROVED

PERMIT NO. **D1300229**

Date: 01/11/2013

Address of Project: 3400 BENNING RD NE		Zone:	Ward: 7	Square: PAR	Suffix: 0169	Lot: 0114
Permission Is Hereby Granted To: Pepco Energy Services		Owner Address: 1300 N. 17 STREET SUITE 1500 ARLINGTON, VA 22209		PERMIT FEE: \$36.30		
Description of Work: Demolition of two installed foam suppression systems.						
Type of Demolition: Exterior	Type of Walls: Non - Load Bearing	# of Ext. Walls Removed: 0	Existing # of Stories: 0	Area of Disturbed Earth > 50sqft:		
Roof Remain: No	Existing Use: Utility	Proposed Use: Utility			Plans: Yes	
Agent Name: A2z Environmental Group, Llc.	Agent Address:	Existing Dwell Units: 0	Proposed Dwell Units: 0	No. of Stories: 0	Floor(s) Involved:	
Conditions/ Restrictions: This Permit Expires if no Construction is Started Within 1 Year or if the Inspection is Over 1 Year. All Construction Done According To The Current Building Codes And Zoning Regulations; As a condition precedent to the issuance of this permit, the owner agrees to conform with all conditions set forth herein, and to perform the work authorized hereby in accordance with the approved application and plans on file with the District Government and in accordance with all applicable laws and regulations of the District of Columbia. The District of Columbia has the right to enter upon the property and to inspect all work authorized by this permit and to require any change in construction which may be necessary to ensure compliance with the permit and with all the applicable regulations of the District of Columbia. Work authorized under this Permit must start within one(1) year of the date appearing on this permit or the permit is automatically void. If work is started, any application for partial refund must be made within six months of the date appearing on this permit.						
Director: Nicholas A. Majell		Permit Clerk: Keith Hawkins		Expiration Date: 01/11/2014		
TO REPORT WASTE, FRAUD OR ABUSE BY ANY DC GOVERNMENT OFFICIAL, CALL THE DC INSPECTOR GENERAL AT 1-800-521-1639 FOR CONSTRUCTION INSPECTION INQUIRIES CALL (202) 442-9557 TO SCHEDULE INSPECTIONS PLEASE CALL (202) 442-9557.						

Department of Consumer and Regulatory Affairs

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D

DEMOLITION PERMIT

THIS PERMIT MUST ALWAYS BE CONSPICUOUSLY DISPLAYED AT THE ADDRESS OF WORK
UNTIL WORK IS COMPLETED AND APPROVED

PERMIT NO. D1300197

Date: 01/07/2013

Address of Project: 3400 BENNING RD NE		Zone:	Ward: 7	Square: PAR	Suffix: 0169	Lot: 0114
Permission Is Hereby Granted To: Pepco Energy Services		Owner Address: 1300 N 17TH STREET ARLINGTON, VA SUITE 1600 22209		PERMIT FEE: \$419.60		
Description of Work: Demolition of 4 above ground storage tanks AST. 3- 4 oil tanks 1- 2 oil tank						
Type of Demolition: Exterior	Type of Walls: Non - Load Bearing	# of Ext. Walls Removed: 4	Existing # of Stories: 0	Area of Disturbed Earth > 50sqft:		
Roof Remain: No	Existing Use: Utility	Proposed Use: Utility			Plans: Yes	
Agent Name: A2z Environmental Group	Agent Address:	Existing Dwell Units: 0	Proposed Dwell Units: 0	No. of Stories: 0	Floor(s) Involved:	
Conditions/ Restrictions: This Permit Expires If no Construction is Started Within 1 Year or if the Inspection is Over 1 Year. All Construction Done According To The Current Building Codes And Zoning Regulations; As a condition precedent to the issuance of this permit, the owner agrees to conform with all conditions set forth herein, and to perform the work authorized hereby in accordance with the approved application and plans on file with the District Government and in accordance with all applicable laws and regulations of the District of Columbia. The District of Columbia has the right to enter upon the property and to inspect all work authorized by this permit and to require any change in construction which may be necessary to ensure compliance with the permit and with all the applicable regulations of the District of Columbia. Work authorized under this Permit must start within one(1) year of the date appearing on this permit or the permit is automatically void. If work is started, any application for partial refund must be made within six months of the date appearing on this permit.						
Director: Nicholas A. Majell <i>Nicholas Majell</i>		Permit Clerk Keith Hawkins <i>KH</i>		Expiration Date: 01/07/2014		
TO REPORT WASTE, FRAUD OR ABUSE BY ANY DC GOVERNMENT OFFICIAL, CALL THE DC INSPECTOR GENERAL AT 1-800-521-1639 FOR CONSTRUCTION INSPECTION INQUIRIES CALL (202) 442-9557 TO SCHEDULE INSPECTIONS PLEASE CALL (202) 442-9557.						